

Brian C. Fraser (SBN 314760)
HOMELESS ACTION CENTER
3126 Shattuck Avenue
Berkeley, California 94705
Phone: (510) 698-1123
Fax: (510) 540-0403
Email: bfraser@homelessactioncenter.org

Attorney for Plaintiff

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CARL BLY,)	Case No.: 2:23-cv-02204-JDP
)	
Plaintiff,)	JOINT STIPULATION AND PROPOSED
)	ORDER FOR EXTENSION OF TIME TO
v.)	FILE PLAINTIFF'S OPPOSITION TO
)	DEFENDANT'S MOTION TO DISMISS
KILOLO KIJAKAZI, Acting Commissioner of)	
Social Security Administration,)	
)	
Defendant.)	
)	

IT IS HEREBY STIPULATED, by and between Plaintiff and Defendant Commissioner of Social Security (Defendant), by and through their respective counsel of record, that the deadline for Plaintiff to file his Opposition to Defendant's Motion to Dismiss be extended by twenty-three (23) days. Defendant filed her Motion to Dismiss on December 5, 2023.

There is good cause for this extension because Plaintiff needs additional time to draft and file his motion and brief due to counsel's heavy workload, despite due diligence. This is counsel's first request for an extension of the briefing schedule in this case.

The current due date for Plaintiff's motion is December 19, 2023. With the Court's approval, the new due date would be January 11, 2024. The parties further stipulate that the

1 Court's Scheduling Order shall be modified accordingly.

2
3 Respectfully submitted,

4
5 Dated: December 18, 2023

/s/ Brian C. Fraser

6 BRIAN C. FRASER

7 Attorney for Plaintiff

8
9 Dated: December 18, 2023

PHILLIP A. TALBERT

10 United States Attorney

11 MATTHEW W. PILE

Associate General Counsel

12 Social Security Administration

13 By: /s/ Christopher Vieira*

14 CHRISTOPHER VIEIRA

Special Assistant U.S. Attorney

15 Attorneys for Defendant

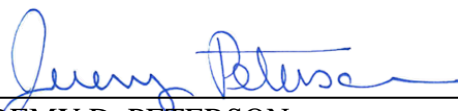
16 *Authorized via email on December 18, 2023

17
18 ORDER

19 APPROVED AND SO ORDERED:

20
21 IT IS SO ORDERED.

22
23 Dated: December 19, 2023

24 
JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE